REMARKS

Summary

Claims 1-36 are pending in this application. Favorable reconsideration and allowance of the pending claims are requested.

MPEP Comment

Applicant respectfully submits that the cited MPEP language on page 2 of the Office Action is directed to functional v. non-functional language as it pertains to § 103 obviousness rejections. Applicant submits, however, that the rejections presented in the Office Action are all § 102 anticipation rejections. Consequently, Applicant respectfully requests clarification of the purpose for citing the selected MPEP sections in relation to the current claim rejections.

Claim Rejections - 35 U.S.C. § 102

Claims 1-36 stand rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent Publication No. 2004/0034760 to Paver et al. ("Paver"). Applicants respectfully traverse the rejection, and requests reconsideration and withdrawal of the anticipation rejection.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102, the cited reference must teach every element of the claim. *See* MPEP § 2131, for example. Applicant submits that Paver fails to teach each and every element recited in

claims 1-36 and thus they define over Paver. For example, with respect to claim 1, Paver

fails to teach, among other things, the following language:

> receiving residual data of a first image and decoded
> pixels of a second image;
> zero-extending a plurality of unsigned data
> operands of the decoded pixels producing a plurality of
> unpacked data operands;
> adding a plurality of signed data operands of the
> residual data to the plurality of unpacked data operands
> producing a plurality of signed results;
> saturating the plurality of signed results producing a
> plurality of unsigned results.

According to the Office Action, this language is disclosed by Paver at paragraphs [0099]

- [0102]. Applicant respectfully disagrees.

Applicant respectfully submits that claim 1 defines over Paver. Paver, arguably,

teaches a method and apparatus for storing SIMD saturation histories. More particularly,

Paver at the give cite, arguably teaches a SIMD mixed mode addition operation.

Applicant submits, however, that the method described in Paver fails to disclose the use

of residual data of any kind as required by claim 1. Furthermore, Applicant submits that

Paver also fails to disclose the specific interactions relating to unsigned, unpacked and

signed data as specifically required by claim 1. Therefore, Applicant submits that Paver

fails to teach each and every element recited in claim 1 as required to sustain an

anticipation rejection.

Applicant respectfully submits that claim 1 defines over Paver. Accordingly,

Applicant respectfully requests removal of the anticipation rejection with respect to claim

1. Furthermore, Applicant respectfully requests withdrawal of the anticipation rejection

with respect to claims 2-8, which depend from claim 1 and, therefore, contain additional

features that further distinguish these claims from Paver.

Claims 9, 14, 23 and 30 recite features similar to those recited in claim 1.

Therefore, Applicant respectfully submits that claims 9, 14, 23 and 30 are not anticipated

and are patentable over Paver for reasons analogous to those presented with respect to

claim 1. Accordingly, Applicant respectfully requests removal of the anticipation

rejection with respect to claims 9, 14, 23 and 30. Furthermore, Applicant respectfully

requests withdrawal of the anticipation rejection with respect to claims 10-13, 15-22, 24-

29 and 31-36 that depend from claims 9, 14, 23 and 30 respectively, and therefore contain

additional features that further distinguish these claims from Paver.

Conclusion

It is believed that claims 1-36 are in condition for allowance. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

Applicants do not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the limitations of the independent claims and dependent claims discussed above. Accordingly, Applicants hereby reserve the right to make additional arguments as may be necessary to further distinguish the claims from the cited references, taken alone or in combination, based on additional features contained in the independent or dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

The Examiner is invited to contact the undersigned to discuss any matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to deposit account 50-4238.

Respectfully submitted,
KACVINSKY LLC

/John F. Kacvinsky/

John F. Kacvinsky, Reg. No. 40,040
Under 37 CFR 1.34(a)

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KACVINSKY LLC
C/O Intellevate
P.O. Box 52050
Minneapolis, MN 55402
(724) 933-5529